

IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF PENNSYLVANIA

RONALD WATSON,	:	
	:	
PLAINTIFF,	:	CIVIL ACTION
	:	
v.	:	NO. 17-1049
	:	
LLOYD INDUSTRIES, INC.	:	
	:	
Defendant.	:	

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**JOINT PRE-TRIAL MEMORANDUM**

**I. Statement of the Case**

Plaintiff Ronald Watson was hired by defendant Lloyd Industries, Inc. to work as a machine operator on December 1, 2014. Mr. Watson was terminated from employment at Lloyd Industries on October 29, 2015 by Thomas Prendergast, Plant Manager. Mr. Watson claims that he was terminated because of his race and color. Lloyd Industries denies that the firing had anything to do with Mr. Watson's race but was caused by a lack of work in his department and that Mr. Watson was not a great employee.

## **II. Legal Argument**

Mr. Watson brings claims of wrongful termination based upon race and color pursuant to Title VII and 42 USC Section 1981 of the Civil Rights Act of 1866. Mr. Watson is seeking compensatory damages for pain and suffering, emotional distress, mental anguish, harm to reputation, lost income, punitive damages, costs, and reasonable attorney fees. Defendant Lloyd Industries denies all alleged wrong doing and contends that Mr. Watson was terminated for legitimate business reasons.

## **III. Statement of Damages**

Plaintiff is claiming that he sustained lost wages of approximately \$29,500.00 and has been employed consistently since April 19, 2017. Defendant is denying that Plaintiff Watson can establish any lost earnings or other damages alleged in his Complaint.

## **IV. List of Witnesses**

1. Ronald Watson
2. Thomas Prendergast
3. William Lloyd
4. Zanetta Ruffin

5. Fred Braker
6. Shawn Broadnax
7. Shaun Mathis
8. Eileen Lindsay

**V. List of Exhibits**

The exhibits provided by the parties were previously provided to the court.

**VI. Status of Settlement Negotiations**

The parties have been unable to resolve the case.

**VII. Special Circumstance in the Case**

None.

**VIII. Length of Trial**

The case should take almost three days.

Respectfully Submitted:

A handwritten signature in black ink, appearing to be 'S. A. Dion', written over a horizontal line.

Samuel A. Dion, Esquire  
Counsel for Plaintiff  
Ronald Watson

A handwritten signature in black ink, appearing to be 'K. J. Cohen', written over a horizontal line.

Keith J. Cohen, Esquire  
Counsel for Defendant  
Lloyd Industries, Inc.

Dated: November 10, 2018